UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

FRONTPOINT ASIAN EVEN DRIVEN FUND L.P., et al.,

Plaintiffs,

- against -

Case No. 16-cv-5263 (AKH)

CITIBANK, N.A., CITIGROUP INC., BANK OF AMERICA CORP., et al.,

Defendant(s).

RULE 7.1 CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendant ING Bank, N.V. ("ING Bank"), a non-governmental corporate party, by and through the undersigned counsel, hereby certifies that ING Bank is a wholly owned subsidiary of ING Groep N.V., which is a publicly held corporation. To the best of ING Bank's knowledge, no other publicly held company owns 10% or more of ING Bank's stock.

Dated: September 6, 2016 New York, New York

/s/ Karen Patton Seymour

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